



# Modern Slavery and Human Trafficking Policy

## Statement

2020



This statement is made in accordance with section 54 of the Modern Slavery Act 2015. Validus Risk Management (“The Firm”) is committed to conducting business in an ethical and honest manner, and to implementing and enforcing systems that ensure slavery and/or human trafficking is prevented.

## **Introduction from the Founding Partners**

Validus Risk Management considers its legal and corporate responsibilities of great importance in relation to its investors, its partners, its employees, and its wider community. The Firm acknowledges that Modern Slavery & Human Trafficking are punishable by up to life imprisonment.

We believe that our Firm faces a very low risk of involvement in slavery or human trafficking in the territories that we are active in. However, we are focused on maintaining our zero-tolerance approach to these issues.

## **Policies**

The Firm’s position towards this topic is enhanced by its internal policies:

- i. recruitment policy by checking the right to work,
- ii. procurement policy by conducting due diligence to its suppliers, and
- iii. whistleblowing policy by enabling the raising of concerns.

Validus Risk Management has implemented these policies and continues to monitor industry best practice.

## **Training**

The Firm provides a mandatory online training course on Modern Slavery and Human Trafficking for all new joiners.

## **Risk Assessment for Slavery and Human Trafficking**

Validus Risk Management is of the opinion that faces a low risk of slavery and human trafficking in its business and supply chains.

This assessment is based on the following reasons:

- i) the nature of its business,
- ii) the territories in which it is active,
- iii) a clean track record,
- iv) the limited range of goods and services forming its supply chains.

## **Procurement due diligence**

The Firm’s policy on procurement requires a due diligence check for all new suppliers. We do not request evidence on modern slavery and human trafficking unless there is reasonable ground to do so.

Furthermore, on a quarterly basis, we conduct a due diligence check on our existing suppliers.

Finally, our employees are encouraged to report any breaches of policies or any other concerns that have come to their attention. These can be disclosed to the Chief Compliance Officer under Validus' whistleblowing policy.

## Approved by Validus Risk Management Limited

Signed by:

A handwritten signature in black ink, appearing to read 'KL', is placed over a rectangular area with a light gray dotted background.

Kevin Lester

CEO